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11 Attorneys for: Material Witness ISMAEL ANYON-FERNANDEZ

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 MARK ANTHONY GALLEGOS,

18 Defendant.

Criminal Case No. 08 cr 1552-W
Mag. Docket No. 08 mj 8333

**NOTICE OF MOTION AND MOTION
FOR VIDEO DEPOSITION AND
RELEASE OF MATERIAL WITNESS
ISMAEL ANYON-FERNANDEZ**

JUDGE: Hon. Peter C. Lewis
CRTRM:

DATE: June 9, 2008
TIME: 1:30 p.m.

19 TO KAREN P. HEWITT, UNITED STATES ATTORNEY, DAVID LESHNER,
20 ASSISTANT UNITED STATES ATTORNEY, GREGORY MURPHY, ESQ., COUNSEL FOR
21 DEFENDANT MARK ANTHONY GALLEGOS.

22 **PLEASE TAKE NOTICE** that on **June 9, 2008**, at **1:30 p.m.**, Gayle Mayfield-Venieris,
23 Esq., counsel for the material witness ISMAEL ANYON-FERNANDEZ (“**ANYON**”) will move
24 this Court for an order to take the video deposition of the material witness, and for his immediate
25 release.

26 **MOTION**

27 Material witness ANYON, through his counsel, Gayle Mayfield-Venieris, and pursuant
28 to Federal Rules of Criminal Procedure, Rule 15, 18 U.S.C. §§ 3142 and 3144, hereby moves

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1 this Court for an order to take his deposition by videotape and release him at the conclusion of
2 the deposition.

3 This Motion is based on this Notice and the Memorandum of Points and Authorities
4 attached and filed herewith, the records of the above-entitled case, and all matters submitted to
5 the Court prior to the determination of this Motion.

6
7 Dated: May 30, 2008

Mayfield & Associates

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9 By: /s/ Gayle Mayfield-Venieris
10 Gayle Mayfield-Venieris, Esq.
11 Attorney for Material Witness
12 ISMAEL ANYON-FERNANDEZ
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